

WINE INSTITUTE

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JOHN A. DE LUCA
PRESIDENT

March 19, 1998

Dr. C.W. Jameson
NTP Report on Carcinogens
MD EC-14
P.O. Box 12233
Research Triangle Park, NC 27709

RE: Alcoholic Beverages and the Ninth Report on Carcinogens

Dear Dr. Jameson:

Wine Institute, the public policy association of California winemakers, welcomes the opportunity to briefly comment on the proposed listing of "alcoholic beverages" in the Ninth Report on Carcinogens, to be published by the Department of Health and Human Services (DHHS) and the National Toxicology Program (NTP).

We urge DHHS, NTP and their expert committee to carefully review all available scientific research on alcohol and health before making a recommendation about the inclusion of "alcoholic beverages" in the new edition of the report. We encourage you to also critically revisit the conclusions of the 1987 International Agency for Research on Cancer (IARC) report in light of the many additional studies that have taken place since then.

Among these studies are dozens of large cohort studies from around the world, including the recent American Cancer Society study¹, that have found significant reductions in overall mortality for moderate alcohol consumers. Other studies have found reductions in certain cancer rates as well, with one recent French study, for example, finding a reduction in cancer of approximately 20 percent in a cohort of 34,000 men.²

These scientific investigations find a clear distinction between moderate intakes of wine, beer and spirits and higher amounts. According to many epidemiological studies, overall mortality rates, including certain cancer rates, have been shown to decrease at approximately one to two drinks per day.^{3,4,5} Further, social science research has indicated that the overwhelming

¹ Thun, MJ. Alcohol consumption and mortality among middle-aged and elderly adults. *The New England Journal of Medicine*, 1997; 337(24):1705-1714.

² Renaud S. et al. Alcohol and mortality in middle-aged men from Eastern France. *Epidemiology*, 1998; 9(2):184-188.

³ Yuan J-M. et al. Follow up study of moderate alcohol intake and mortality among middle aged men in Shanghai, China. *British Medical Journal*, 1997; 314:18-23.

⁴ Fuchs CS. et al. Alcohol consumption and mortality among women. *The New England Journal of Medicine*, 1995; 332(19):1245-1250.

⁵ Doll R and Peto R. Mortality in relation to consumption of alcohol: 13 years' observations on male British doctors. *BMJ*, 1994; 309:911-918. Other references available upon request.

majority of Americans drink moderately, with the National Institute on Alcohol Abuse and Alcoholism (NIAAA) recently noting in the 9th *Report on Alcohol and Health* that nearly 93 percent of Americans are at "no risk of developing alcohol-related problems." Studies also demonstrate that wine drinkers are overwhelmingly moderate and responsible consumers, drinking on average no more than 4.5 glasses per week, mostly in home mealtime settings.⁶ These consumption patterns, which are consistent with recommendations from the 1995 *Dietary Guidelines for Americans*, should be considered as part of your evaluation on alcohol. The *Guidelines*' "Advice for Today"—"If you drink alcoholic beverages, do so in moderation, with meals, and when consumption does not put you or others at risk"—was the result of a review of all medical data on alcohol consumption and health, including cancer.

Wine Institute is committed to the responsible consumption of wine and strongly supports the current 1995 *Dietary Guidelines* position as well as other responsible consumption messages. Please keep us notified about your review process and contact us if we can be of further assistance to you in any way.

Sincerely,



John A. De Luca
President

JDL:kc

⁶ Klein H and Pittman D. Drinker prototypes in American society. *Journal of Substance Abuse*, 1990; 2:299-316.